

PAUL DAVID FREEMAN-EL.#150481

- VS -

FRANKIE Adams, Back # 216

Robbly Sullivan, Badger #279

Zachariah Albright, Badge #

John A. Blackley, Badge # 193

Draws Judeo Capt. of SPGR

Case No. \_\_\_\_\_  
(To be assigned by Clerk  
of District Court)

"JURY TRIAL DEMANDED"

1. State the grounds for filing this case in Federal Court (include federal statutes and/or U.S. Constitutional provisions, if you know them): U.S.C. Title 18 1983 For: Slander, And wrongful imprisonment. While acting under the Color of State Law, and at all times relevant, Defendants [Adams (08/22/11) - (Nov. 3, 2011)] insidiously conspired up and caused to be spread a vicious rumor that Plaintiff was an informant and community snitch responsible for the arrest of LA Plus Persons [08/22/11], Tony Gray [Oct. 2011], the Timothy Draper [11/11/11] leading to irrevocable damage and harm to Plaintiff, as Sullivan knowingly arrest Plaintiff without a warrant and without probable cause leading to his wrongful imprisonment, in violation of the 4th, 5th, 6th, 8th and 14teenth Amendment to the U.S. Constitution, and Civil Right violations.

II. Plaintiff, PAUL DAVID FREEMAN-EL resides at

2727 Highway K, Bonne Terre, St. Francois,  
street address city county

Mo, 63, \_\_\_\_\_  
state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

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III. Defendant, Frankie Adams lives at, or its business is located at

215 N. New Madrid, Sikeston, Scott,  
street address city county

Missouri, 63801.  
state zip code

(if more than one defendant, provide the same information for each defendant below)

Bobby Sullivan - 215 N. New Madrid, Sikeston, Mo 63801, Scott Co.  
Zach Albright - 215 N. New Madrid, Sikeston, Mo 63801, Scott Co.  
Wb Blackley - 215 N. New Madrid, Sikeston, Mo 63801, Scott Co.  
Drew Jordan - 215 N. New Madrid, Sikeston, Mo 63801, Scott Co.

- IV. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary):

(1) Plaintiff Parole was revoked May 21, 2009, necessitating his May 29, 2009 Remand and eventual June 6, 2011 Re-Parole. (2) On or about June 21, 2011, Plaintiff had a verbal confrontation with Frankie Adams about his unconstitutionally offensive misconduct and inexplicable comments and racial profiling remarks towards himself and other Sikeston's Black youth during his tyrannical patrols of the Westend of Sikeston's Black Community. (3) Throughout the month of July 2011, Adams started harassing Plaintiff via unofficially stopping and frisking him as he canvases Sikeston's Area, where Plaintiff was impelled to lodge informal complaints against Adams with Sikeston's N.A.A.C.P. Members, Pastor Ronald Williams, Jessie Redd and other prominent leaders about Adams lawless practices at the Park's Pavilion Area - insofar as prompting his K-9 to always urinate or defecate in proximity of our gathering. (4) On or about August 22, 2011, Sikeston Public Safety Department and a multi-tasked drug agency conducted an early morning raid that led to the arrest of approximately 63 plus persons stemming from an 18-month state, local and federal wire tap operation and investigation, which Plaintiff was not a subject to nor of. (5) On September 3, 2011, Cleba Williams approached Plaintiff stating: "Damn Linc, your named is messed up out here, Adams said wasn't for you and Tracy Moore, they wouldn't have been able to make those arrest." Bewildered, Plaintiff vigorously questioned Cleba who reiterated, Linc, I love you man, I wouldn't make something like this up, this could get you flatlined out here Bro: Adams just told me this shit on Westside Store Lot Caus" where I angrily fled to only to find Adams gone. (6) I then went and told both my Uncle Gene Freeman and Mother Jessie Freeman about this vicious lip, where both advised me to call Sen. Madia Coleman and lodge a complaint against Adams. Adams knew or should have known - in his 1400 plus hours of law enforcement training - in his official and/or individual capacity, and 13 years of experience - (see attached pages 3A-3K)



CONT: STATEMENT OF Claims: 3-A

ience therein, that such onimous lies and seditious Rumors in his official and/or individual capacity, would and could have caused Plaintiff and his Family and love ones their lives, liberty and Pursuit of happiness, but For the concomittant reprisal violent Drug Dealers could've Reaped UPon Plaintiff in False confirmation Plaintiff was the snitch responsible For their August 22, 2011 ARREST.

(7) On or about September 4, 2011, I APPROACHED Adams at Luther and Dsage with Clebo Williams, stating exactly what Clebo said Adams told him in PARAGRAPH "(5)", AS Clebo REStated, "Adams, You told me Linc was the snitch that help You all make them ARREST." Adams smurked at us stating, "I don't even know You man," to me. I then ASKED Adams to subisist and CEASE SLANDERING my name before someone or MYSELF got hurt or Killed under such False Pretenses. Adams smiled, got in his Patrol vehicle laughing as he Pulled off. Clebo says he FEAR signing an Affidavit to my Family.

8). On or about September 13, 2011, JERRY A/K/A FEE DORSEY APPROACHED Plaintiff and stated, "Adams Just told me that You ARE the snitch that told on everybody ARRESTED during the raid cows. That's messed UP. Everybody knows and ARE talking bad about You. That's why People ARE carrying You CRAZY. I don't know, but Adams is telling People You ARE a snitch. Watch Your back. Word is, someone is Planning to Fuck You UP. Be CAREFUL out here at night Paul, because there's is a Price on Your head. Stop walking with Paulvier, Your little Boy late in the evening. Defendant Adams knows or should've known in his 1400 Plus hours of LAW ENFORCEMENT TRAINING, and 13teen YEARS of exPERIENCE therein, that such onimous lies and Rumors- in his official and individual capacity, would and could have caused Plaintiff and/or his Family and Love ones their lives, liberty and Pursuit of happiness. Dorsey told my sister Lola she FEAR stepping UP.

9). On or about September 16, 2011, Plaintiff vehemently APPROACHED Adams AGAIN about his continuum slander and life-threatening Rumors as an insidious Play now giving rise to the misplaced escalating Fuedals and unwarranted AFFRONTs Plai-

CONT: STATEMENT OF CLAIMS: 3-B

ntiff was Facing in the Black Community, but For Adams invidious RIPLE-EFFECT RUMORS David Trite, Lawrence Brown, Thomas A/K/A Porchie Wiley, Rodger A/K/A ARKANSAS, inter Alia, were Spreading throught the Black Community, leading to their, as well as others Physical Confrontations and Attack on Plaintiff; Alike the Fight Plaintiff had with Tracey Moore due to the same circumstantial rumors- Mike Baker and Bobby White defused. Defendant Adams directed Plaintiff to move on or be Arrested, as I complied with withstanding the fact that Plaintiff is on parole with there (3) consecutive life sentences, as 2/3rds of Plaintiff's Peeps, Family, Foes and Friends decimated his character throughout his neighborhood, shun, alienated and left him ex-communicated, dejected and Clinically Depressed.

10). Starting about Sept. 18-27, 2011, and thereafter, Chris Howard would CRUISE through the Westend Black Community to await my Union amidst a crowd, jump out of his vehicle with his hand in his back waist-line, ranting and loudly raving derogatory comments and hurtful remarks like: "You rat snitching bitch. IF you ever tell anything on me, I'll blow your fucking brains out. SAY something!", Gesturing he was armed at Rita Simmons house that day, as her son, Sam Warfield, Glenn White, Marvin Thomas, Elisabeth A/K/A Liz, Ronnie Mitchell and numerous others cringed in fear I was about to be gunned down, as I stood my ground angering Chris who further exclaimed, "I'll be back. HAVE YOUR RAT AS HERE," as I was asked to leave in utmost anguishment about my inability to defuse the egregious RIPLE-EFFECT informant rumor and its onimous affronts. Chris Howard went to Westside Store and throughout Sikeston's Black Community telling everyone "There's a \$3,000 reward and hit on this rat bitches head," as Plaintiff emotionally disintegrated and his family helplessly prepared for the worst, characterized by his relapse, sle-



CONT: STATEMENT OF CLAIMS: 3-C

of deprivation, loss of appetite and counter-productive behavioral patterns. Defendant Adams knew or should've known in his 1400 plus hours of Law Enforcement Training and, 13 years of experience therein, while acting under the color of State Law in his official and/or individual capacity, that such lawless torts and rumors would and could have life-threatening and devastating causations to Plaintiff and his family/love one's life, liberty and the pursuits of happiness.

11. On September, 28, 2011, at approximately 1:45 a.m. three (3) unknown vehicles sped by Plaintiff as someone fired several shots in Plaintiff's direction, yelling, "Get off the streets you rat bitch." As I walked and then fled down Washington St. I returned the next day to further investigate as Wynetta Patterson [207 Luther St. (513) 472-2865], Michael Baker, Bobby White and others exclaimed, "We heard five cars chased you last night and someone shot at you Paul. They said you and Chris fought after he slapped you. Paul man you better be careful out here man." Defendant Adams knew or should've known in his 1400 plus hours of Law Enforcement Training and, 13 years of experience therein, while acting under the color of State Law in his official and/or individual capacity, that such rumor would and could have life-threatening and devastating causations to Plaintiff and his love one's and family lives, liberty and the pursuit of happiness. Plaintiff dreadfully relented to report this matter fearing Adams colleagues were co-horts and that it'd lead to his parole revocation.

12. On or about Oct. 3, 2011, Plaintiff became emotionally overwhelmed and began to experience excruciating migraines, debilitating upper-chest and acute back pains that rendered Plaintiff incapacitated, as he laid on his mother's living room

CNT: STATEMENT OF CLAIMS: 3-D

Floor crying in utter pain, where his Mother and Uncle Jessie and Gene Freeman watched over him stressing about his Fate and their inability to convince Plaintiff to go Legent Care. Plaintiff sister Lola Emerson was called on numerous occasion to help care for Plaintiff during these Acute and mysterious episodes.

13). On Oct. 4, 2011, Plaintiff called Madia Coleman, Congresswoman JoAnn Emerson's and Sen. Claire McCas-ter's Office to lodge formal complaints, to no avail, insofar in his repeated failures to converse with the latter two (2) Representatives, who Phone Logs will verify these calls.

14). On or about Oct. 15, 2011, in the presence of JD Harris, Alvin Baker, Malcomb A/K/A Littleman Harris, Wynetha Pat-terson, Thomas Wiley and others, Julius A/K/A Cee Cee Neal was released from Scott County Jail, where himself and his Brother Gary Moore abruptly exited a vehicle, approach- ed me and stated, "Everyone's saying you called the Pol- ice on us. Even Adams said it was you," where numerous weapons and drugs were seized and leading to their arrest; others parole revocations, charges, imprisonments and fu- ture ensposed threats of harm upon their releases.

15). In later Oct. 2011, Defendant Adams road up Osage St. and gradually stopped under the Tree of Knowledge, exited his Patrol vehicle and stated to Bobby White, Ronny Harris, Lawrence Brown, Thomas Wiley, etc., "Where did the Big Time Drug Dealer Freeman go? Tell him I got his wallet/ ID from that Black P.T. Cruiser and I'll see him later," as I walked away upon seeing him approach.

16). On Nov. 3, 2011, at approximately 7:40 p.m., Plaintiff was standing on Luther St. talking from a distance to Shea Valentine, Mar@lise-Leanna-and-Scipio Williams



CONT: STATEMENT OF CLAIMS: 3-E

When Shea exclaimed, "Who in the hell is that driving up the one way with them bright ass lights on," as Plaintiff stepped off the sidewalk looking down Luther St. seeing an unidentifiable vehicle accelerating towards him with only its hybrids blaring. Plaintiff fled as it came at him. Jumping the curb, over the sidewalk and chasing Plaintiff west bound via an empty lot between Bea's House and the Mason Building, turning right and north bound in the Alley. As the vehicle abruptly stopped and the Plaintiff continued to the other side of Bea's House, across Luther St., and into L.D. Anderson's Fenced in Backyard where he stooped beside a bush to collect his bearings. Moments later Plaintiff heard numerous sirens and saw people moving about with flash lights yelling, "He's over here somewhere." Plaintiff then stood up stating, "Here I am! What you all want with me?" as Defendant Adams stated, "Come out of there right fucking now you S.O.B." As I exited west via L.D.'s Driveway, I saw Sgt. Albright to my left (see attached illustration MARK Pit. EX. D) gesturing that I come to him. As I complied, stepped into the street from the Driveway, I heard a verocious bark and scrapping of claws to my right. As I looked as saw Defendant Adams release and commanded his K9 ERCS to attack, who leaped knocking Plaintiff to the pavement on his back as it violently bite into Plaintiff's left wrist puncturing it. I yelled and pled with Adams and Sgt. Albright to retrieve the dog biting up and down Plaintiff's left arm. Both parties stood over Plaintiff smirking and yelling, "Roll over on your face first, then I'll get him. Roll over," as I replied, "I can't move without the dog biting me in my face." Defendant Adams then gave the K9 another order as it moved towards my collar area viciously tugging [see Pit. EX. B Annexed hereto for descriptive pervarications].



CONT: STATEMENT OF CLAIMS: 3-F

At my coat until it ripped it off. Poising For another strike when Bea Patterson [act witness] and other standbys decried the attack leading to Adams recalling the dog. Sgt. Albright then grabbed, turned me over dropping his knee into Plaintiff's spine, handcuffed and violently snatched me up, slam me into a patrol car and then placed me into Officer Mario Whitney patrol vehicle for transport bleeding from my left wrist and mouth. Plaintiff told Whitney that Adams came up a one-way street about 40mph with no cherries or siren on to indicate it was a police, only his bright lights, so everyone fled as the car veered towards us. Whitney stated, "He can do that. It's our S.O.P."

17). On Nov. 3, 2011, Defendant Adams told Whitney and his fellow arresting officers during booking, "I'm charging him with assault on me and my dog and, resisting arrest. He's on parole with life. How you like that convict?" Plaintiff replied, "You know you are lying. I never assaulted anyone or resisted arrest. You're making a fraudulent arrest and misrepresentation against me in reprisal for approaching you about your damn lies to people in my neighborhood that I was an informant, Adams," who smiled and stated, "You put me and my dog in fear convict." Defendant Adams knew or should've known that his actions would and could have caused Plaintiff his parole liberty. SEE: Plaintiff's Affidavit attached hereto # 1/6

18). On Nov. 4, 2011, Plaintiff was transported to Scott County Jail charged with 2nd° Assault times two and, resisting an arrest felony charges, with a \$10,000 cash only bond.

19). Upon entering Scott County Jail Nov. 4, 2011, Stafford McClellon, Terese Baker and Bobby Moore warned Plaintiff to watch his back, in that two white dudes in D-Pod had said Adams told them Paul Freeman was the snitch who caused their arrest. I asked Tony Gray and the unknown white

CONT: STATEMENT OF CLAIMS: 3-C

male ARRESTED in late Oct. 2011 on Westside Side Lot by also Frankie Adams. Both stated, "Adams told us You set us UP. Ran OFF with OUR DRUG money and then called in Getting us ARRESTED." AS WE ARGUED AND I ASSURED them that this was not true and, that Adams has been telling People things like this About him For months.

201. On Nov. 9, 2011, Plaintiff APPEARED before Judge Scott Herman who READ the CHARGES, SET Bond Amount and scheduled a Preliminary Hearing For Dec. 6, 2011, where Plaintiff REPludiated the CHARGES REQUESTING A Bond Reduction. Judge Herman stated, "Here is my Problem. Why did You RUN?" Plaintiff EXPlained: "There has been SEVERAL vehicle-Jump-out Related-shootings-in-this-neighborhood-in-the-last-Few-months-and, I-SAW-A-CAR-SPeeking-UP-A-ONE-WAY-Street-excelerating-towards-me-with-its-hybrids-blaring-and-blinding-me, so-I-too-Fled-not-knowing-who-it-was. The CAR-didnt-have-no-Red-lights-or-Siren-on, Your Honor." Judge Herman reduced the \$10,000 Cash Only Bond to \$250.00 Cash Surety. On Nov. 12, 2011, AFTER SPENDING nine (9) days in Scott County Jail, Plaintiff Posted the \$250.00 Bond. On Dec. 6, 2011, Scott County Prosecutor nolle Prosed Defendant Adams Nov. 3, 2011 ARREST CHARGES. SEE: Plt. Ex's B and C ATTACHED.

211. On Nov. 15, 2011, Plaintiff called Pastor Ronald Williams about Defendant Adams' UNPROFESSIONAL and ONGOING lawless Police misconduct, Preceding harassment, malicious UNFOUNDED ARREST, brutality, FRAUDULENT OFFICIAL REPORT and EXCESSIVE USE OF UNNECESSARY dog ATTACK FORCE AND ABUSE. Pastor Williams advised he would contact my Parole OFFICER, Stating: "Paul, until others stand UP and decry this Guy's lawless Practice and daily ABUSES towards Blacks here in our community, nothing is going to change. He knows You ARE on Parole. Just stay out of his way, and hopefully he will



CONT: STATEMENT OF CLAIMS: 3-H

LEAVE YOU ALONE. I'm going to call your Parole Officer AFTER I hang up. HOPEFULLY, God will work it out. Stay low and out of his [Adams'] cross hairs.

22). On Nov. 17, 2011, At APPROXIMATELY 5:00 P.M., Plaintiff and Timothy DRAPER got into a violent verbal altercation and pushing bout AFTER I UNEXPECTEDLY WALKED UPON Tim DRAPER loudly telling Alvin BAKER, Virgil Tate, Henry Henderson, Lee Lee Jones, Shea Valentine, Mike BAKER, Bobby White and others that Sgt. Albright, Detective Blakley, Lt. McMillen, Adams and an UNKNOWN OFFICER, AFTER ARRESTING him earlier that day at 1507 OSAGE ST., took DRAPER to Sikeston's Police Station showing him Pictures of Plaintiff ASKING: "Do You know him? Well, this is the Person who called in on you and told us where you were. This is how we knew you were there." leading to our ensuing Fight Forestalled upon SEVERAL Sikeston Police being dispatched to Luther and OSAGE REGARDING A POSSIBLE ATTACK on Plaintiff by Timothy DRAPER and two UNKNOWN males. SEE: PLT. EX. E-1 and E ATTACHED hereto. Defendant Adams and his above named COLLEAGUES knew or should have known that such malicious lies would and could have these types of consequences and, caused Plaintiff his life, liberty and the Pursuits of happiness.

23). On Nov. 17, 2011, immediately hereafter, I called Sikeston's Police Department to finally lodge a Formal Complaint, as the Dispatch OFFICER advised that I report to its Station to complete the Complaint Forms. I then used Johnathan Blackman Phone to call my Sister Lola Amerson and told her what had just occurred, called Senator Claire McCluster's OFFICE to lodge a Complaint, and then went back to Luther and OSAGE to FACE my ASSAILANTS and CLEAR



CONT: STATEMENT OF CLAIMS: 3-I

this matter UP when I was accosted and UNLAWFULLY ARRESTED WITHOUT A WARRANT OR PROBABLE CAUSE FOR A CLASS A-MISDEMEANOR OF RECEIVING STOLEN PROPERTY: AN OFFENCE SULLIVAN'S PROBABLE CAUSE AFFIDAVIT UNREBUTIVELY ARTICULATED THAT HIS COOPERATIVE INFORMANT RITA PATTERSON WAS IRREFUTABLY GUILTY OF, INASMUCH THAT SHE ADMITTED TO, HAD IN HER POSSESSION, PURCHASED AND GAVE THE STOLEN 32" T.V. BACK TO DEFENDANT SULLIVAN, WHO LOCATED PLAINTIFF A SHORT TIME LATER AND PLACED HIM UNDER ARREST FOR THIS SAID OFFENCE; WITH AN INCIDENTAL B FELONY CHARGE OF POSSESSION OF 1.2 GRAMS OF CRACK-COCAINE. SEE ATTACHED PLT. EX. A. DEFENDANT SULLIVAN KNEW OR SHOULD'VE KNOWN IN HIS 120 HRS. OF LAW ENFORCEMENT TRAINING AND, 17 YEARS OF EXPERIENCE THEREIN, THAT HIS LAWLESS POLICE CONDUCT AND PRACTICE VIOLATED PLAINTIFF'S INALIENABLE FOURTH AMENDMENT SAFEGUARDS CONSTITUTING SULLIVAN'S UNLAWFUL ARREST, FALSIFICATION OF HIS OFFICIAL REPORTS [PLT. EX. A AND H ATTACHED] AND ADVERTENT PERJURIOUS FEB. 22, 2012 PRELIMINARY HEARING TESTIMONY, ALL ENCOMPASSING, COULD AND WOULD ULTIMATELY SABOTAGE PLAINTIFF'S PAROLE STATUS FIRST; SECOND, NECESSITATE PLAINTIFF'S FALSE IMPRISONMENT; AND THIRD, AS A CITIZEN, EXTINGUISH HIS LIFE, LIBERTY AND THE PURSUIT OF HAPPINESS BUT FOR DEFENDANT SULLIVAN'S LAWLESS POLICE MISCONDUCT.

24). DEFENDANT SULLIVAN RELENTED TO ARREST THE RESIDENT AT 412 SUNSET [RITA PATTERSON] FOR THE FOREGOING REASONS: SHE WAS, AT ALL TIMES RELEVANT, OUT OF JAIL ON WHAT'S KNOWN TO BE AND BEING TERMED AS "A BOBBY BOND" FOR AN ARREST AND \$10,000 CASH ONLY BOND PERTAINING TO AN AUGUST 2011 CONSPIRACY TO TRAFFICK DRUGS WARRANT SULLIVAN SPONSORED, IN WHICH RITA INITIAL FLED FROM, BECAME A FUGITIVE OF, AND WAS EVENTUALLY APPREHENDED DURING AN INCIDENTAL TRAFFIC STOP OF CARLOS JONES- THEREFORE, WHERE SULLIVAN THEN CONSULTED WITH RITA [AND MANY OTHERS ALIKE] AND FACITED HER BONDLESS

CONT: STATEMENT OF CLAIMS 3-J

Release From Scott County Jail in Sept. 2011.

25). On Nov. 18, 2011, Plaintiff told Detective Blakley what Adams and other Police co-horts were, had and continued to do, as delineated and incorporated in PARAGRAPHS 5, 8, 10, 14, 16, 19 and 20 herein. Blakley then stated, "I worked that case for two years, and I know you wasn't our snitch; but Chris Howard did work with us on this case [August 2011 raid and 63 person round up], but you wasn't on our team here. So who is talking? How do you think Chris Howard do the things he does in your neighborhood [carrying/selling drugs]? Because he works for us, that's how. I don't know why Adams would say this, even if it was true, he knows better than to do this. I will talk to him about this Freeman. Have you had any problems with Adams before all this happen; the rumor, I mean," as I confided I had and to what extent. Blakley then stated, "When will he learn? This was really a bad thing to do. He knows better."

26). On Dec. 15, 2011, Plaintiff was remanded to MoDC/ERCC but for the Nov. 18, 2011 Parole Warrant and Revocation Recommendation stemming from the Nov. 17, 2011 aforesaid arrest outlined in PARAGRAPH "23)." herein, and on the Delayed Action Recommendation Report regarding Adams Nov. 3, 2011 refiled Nov. 4, 2011 charges - Dec. 6, 2011. Both Adams and Sullivan knew or should've known that their long standing, wide spread lawless Police misconduct and practices could and would sabotage Plaintiff's Parole contingencies and status, and violate Plaintiff's 4th, 5th, 8th and 14th Amendments and Civil Rights to be free of such torts by a State Actor.

27). On Dec. 20, 2011, Plaintiff was referred by ERCC's Mental Health Reception and Diagnostic Staffer to be evaluated by its Institutional Psychiatrist Dr. Reddy, after exhibiting overhearing emotional distress. After an extensive con-



CONT:      STATEMENT OF CLAIMS:      3-K

sultation and visual analysis, Dr. Reddy's diagnosis was that I'm suffering from Clinical Depression. Dr. Reddy's Prognosis entailed a script for 100 mg of Zoloft to be taken daily. This newly developed mental disorder is an enigma attributed to the egregious state of affairs associated with the insidious and slanderous ripple-effects of the rumor Adams conjured up and maliciously caused to be spread via others in the nucleus of my neighborhood who vehemently attacked, dePraved and deFaced Plaintiff at every interval, as a Perceived Community-Snitch.

28). Defendant Juden is the Captain of Sikeston Police Department, and is invested with the Statutory obligation to subjugate his subordinate's torts as State Actors, while acting under the color of State Law. Defendant Juden failed wholly to monitor, control, reprimand and hold Defendant Adams accountable for his lawless Police misconduct [August 22, 2011 - Nov. 3, 2011] and torts precisely outlined herein [see Paragraph 2-5, 7-9, 15-17 and Plt. Ex. B, C and D nolle prose 12/6/11]; and, to do the same as it pertained to Defendant Albright, Blakley's [see Para. 22 and Plt. Ex. F-1 and G] and Sullivan's [see Para's 22-25, Plt. Ex. A, E and H] long standing, widespread lawless Police misconduct and practice within his Department. Juden knows; knew or should have known about his subordinator's egregious abuses of Plaintiff but for Adams malicious slander and rumors perpetuated Nov. 17, 2011, in particular by Albright and Blakley causing Plaintiff additional physical pain, alienation, rejection, release; false arrest and an unlawful nine days of imprisonment; the parole perils, eventual revocation and unfounded wrongful re-incarceration but for and attributable to Sullivan's Nov. 17, 2011 unlawful arrest and lawless Police misconduct and practice. Defendant Juden failure to maintain vigilance over his Department, and to promote policy etiquette to extinguish these torts - caused the Plaintiff irrevocable harm and damages therefrom.

29) All Defendants are sued in their individual and official status.



V. Relief: State briefly and exactly what you want the Court to do for you.

1). A Public Admission and Letter of Apology to Plaintiff and his decimated Family via Sikeston's Standard Democrat From Adams, Pres. and SPAD. 2). Permanent Injunction Terminating Adams as a Police Officer with SPAD and Abroad For his insidious and reckless Abuse of Public Trust. 3). A Hate Crime Referral Prosecution Against Adams For his wanton inflictions. 4). Court Ordered Expungement of "All" records relative to the Nov. 3, 2011 Unfounded, malicious and False Arrest and Dismissed 12/6/11 as outlined via Attached Plt. Ex. B and C hereto. 5). An Expedient Payment of "All" monetary awards sought. 6). An Injunction that "All" Defendants be suspended without pay Pending the Final disposition of this case; demoted For their egregious and Pernicious misconduct violation. An Injunctive Mandate Facilitating a Full Scale Internal Affairs (IA) and FBI Investigation (See: Attached "Page 4")

VI. **MONEY DAMAGES:**

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES [☒]

NO [☐]

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages: 1) \$5,000 per day x 9 = \$45,000 For each unlawful day served in South County Jail due to Adams Unfounded and malicious Arrest. 2). \$250.00 Actual Damages; 3). \$1,000,000 in Punitive damages; 4). \$1,000,000 For mental anguish, Pain and Suffering caused by Adams' slanderous Rumor and lawless Police misconduct giving rise to Plaintiff's eventual emotional exasperation (See: Attached "Page 4")

VII. Do you maintain that the wrongs alleged in the complaint are continuing to occur at the present time?

YES [☒]

NO [☐]

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 21 day of May, 2012



Signature of Plaintiff(s)

CONT: PAGE 4

V. Relief: State briefly and exactly what you want the Court to do for you.

into SPSD Head Quarter's incessant, collusive and clandestine long-standing, widespread lawless and discriminatory treatment practices and conduct exhibited towards Sikeston's African-American citizenry, in general, Black Youth in particular and, as it relates to Defendant's Adams', Sullivan's, Albright's, Blakley's and Officer Ratale's unethical Police misconduct in eliciting and ascribing to Black Probationers and Parolees blatant contingency violations in mere exchange for their informant stewardship.

#### VI. MONEY DAMAGES:

Release, vagabondage and impending Parole Perils associated with Adams' insidious defamation Aug. 22, 2011, and, to Tony Gray, etc., Oct. 2011.

DEFENDANT ALBRIGHT: \$1,000,000.00 in Punitive damages for the mental anguish, pain and suffering associated with his slander and lawless Police misconduct Nov. 17, 2011, in telling Timothy Draper that Plaintiff was the one that called in on him leading to Draper's arrest.

DEFENDANT BLAKLEY: \$1,000,000.00 in Punitive damages for the mental anguish, pain and suffering associated with his slander and lawless Police misconduct Nov. 16 and 17, 2011, in telling Timothy Draper that Plaintiff was the one that called in leading to Draper's arrest that day.

DEFENDANT SULLIVAN: 1). \$1,500 Per day x 29 = \$43,500, to be paid by Sullivan in his individual capacity for each unlawful day I spent in Scott County Jail from Nov. 18, 2011, preceding my Dec. 15, 2011 MoDOC/EBNC Parole Revocation Remand, but for Sullivan's warrantless lack of Probable Cause arrest, knowingly in violation of Plaintiff's 4th and 5th Amendment Rights, \$3,000,000 in Punitive Damages associated with his advertent falsification of the official reports and perjurious Feb. 22, 2011 Preliminary Hearing testimony to further the wrongful Parole Revocation and, \$5,000,000 for causing my wrongful imprisonment.

DEFENDANT JUDEN: \$1,000,000.00 in Punitive damages for his dereliction of duty and, statutory failure and deficiency to monitor and subjugate his subordinate employee's lawless Police misconduct and, \$1,000,000.00 for Plaintiff's irrevocable mental anguish, pain and suffering stemming from these unwarranted State Actor torts.